## LATHAM & WATKINS LLP

885 Third Avenue New York, New York 10022-4802 (212) 906-1200 Keith A. Simon, Esq. Email: keith.simon@lw.com

Counsel for Citibank, N.A.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

: Chapter 11 : Case No. 20-11563 (SCC)

Debtors. : (Jointly Administered)

## NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Latham & Watkins LLP ("<u>Latham & Watkins</u>") hereby enters its appearance as counsel of record for Citibank, N.A. ("<u>Citi</u>") in the above referenced chapter 11 cases pursuant to Section 1109(b) of the Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>").

PLEASE TAKE FURTHER NOTICE that Citi hereby appears in the above-captioned jointly administered cases by its counsel, Latham & Watkins LLP, and such counsel hereby requests, pursuant to Rules 2002, 3017, 9007 and 9010 of the Bankruptcy Rules and Sections 102(1), 342 and 1109(b) of the Bankruptcy Code, that copies of all notices, pleadings given or

<sup>&</sup>lt;sup>1</sup> The Debtors in these cases, along with the each Debtor's registration number in the applicable jurisdiction, are as follows: Grupo Aeroméxico, S.A.B. de C.V. 286676; Aerovías de México, S.A. de C.V. 108984; Aerolitoral, S.A. de C.V. 217315; and Aerovías Empresa de Cargo, S.A. de C.V. 437094-1. The Debtors' corporate headquarters is located at Paseo de la Reforma No. 243, piso 25 Colonia Cuauhtémoc, Mexico City, C.P. 06500.

filed in these cases, be given and served upon them at each of the following addresses, telecopies, e-mails and telephone numbers:

## LATHAM & WATKINS LLP

885 Third Avenue

New York, NY 10022-4834

Attention: Keith A. Simon, Esq.

Madeleine C. Parish, Esq.

Telephone: (212) 906-1200 Facsimile: (212) 751-4864

E-mail: keith.simon@lw.com

madeleine.parish@lw.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Code and the Bankruptcy Rules provisions specified above, but also includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities and statements of affairs, operating reports, plan or plans of reorganization or liquidation, and disclosure statements, whether formal or informal, and whether transmitted or conveyed by mail, courier service, telegraph, telephone, e-mail, facsimile, telex, or otherwise, that affect the above-captioned debtors or the debtors' estates.

PLEASE TAKE FURTHER NOTICE that demand is also made that the above-referenced attorneys be added to the Notice List for notice of all contested matters, adversary proceedings, and other proceedings in these chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any subsequent appearance, pleading, claim or suit is intended to waive and shall not constitute a waiver of (i) Citi's right to have final orders in non-core matters entered only after *de novo* review by a District Court; (ii) Citi's right to a jury trial in any proceedings so triable herein, or in any case, controversy, or proceeding related hereto; (iii) Citi's right to request to have the reference

withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Citi is or may be entitled to under agreements, documents or instruments, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: New York, New York July 7, 2020 LATHAM & WATKINS LLP

By: /s/ Keith A. Simon Keith A. Simon, Esq.

Madeleine C. Parish, Esq.

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